

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI

United States
Plaintiff

V

Christopher Stephens
Defendant

4:21-cr-00152-DGK

Defendant Christopher Stephens Motion
to Discharge Counsel And Appoint New Counsel

Comes now defendant Christopher Stephens
and for his motion states:

1. Defendant Christopher Stephens is currently incarcerated
2. Defendant Stephens is presently represented by Steven Willibey
3. Defendant Stephens is claiming Ineffective assistance of Counsel, defense counsel has not kept defendant reasonably informed
4. Defense Counsel has not provided defendant with Discovery to view, making it impossible to understand the nature

and cause of the accusations against him

5. Defendant Stephens has been informed pursuant to US Supreme Court case *Class v US*, 200 L Ed 37 (2018) that the plea of guilty is, of course, a confession of all the facts charged in the indictment, and also evil intent imputed to the defendant.

6. Defendant is entitled at the least to enter a plea of "guilty" or "not guilty" as he may choose on the basis of a fair and reasonable complete understanding of the nature and cause of the accusation against him. Defendant cannot upon a bare reading of the specific indictment now pending before the bar of the court understand the charges. It is clearly ineffective assistance of counsel that defense counsel has not provided defendant with all discovery that is within his possession and control. Or even file motions to obtain all discovery.

7. Defense Counsel does not inform defendant when he changes or re-schedules all hearings, or even see if he

is alright with setting court dates way far ahead of normal proceedings. Such an approach is altogether incompatible with defendant's Constitutional and Statutory rights to a fair and speedy trial.

8. Defense Counsel makes promises to defendant and does not follow through with those promises.

9. Defense Counsel promised defendant he would file bond hearings for "medical bond" reasons that are serious medical needs.

10. Defendant has not received adequate medical care, has a broke hip, broken shoulder, and initially was not given a wheel chair for months, forcing him to hop around. Being denied adequate medical care has made all medical issues worse off, creating a life long disability.

WHEREFORE, defendant respectfully request an order discharging present counsel and appointing New Counsel or CJA attorney pursuant to the Criminal Justice Act. ~~ACT~~

By: ~~Christopher Stephens~~

Christopher Stephens # 51727-509

Bates County Detention

6 West Fort Scott

Butler, Mo. 64730

Date: 4/10/2022

CERTIFICATE OF SERVICE PRISON MAIL BOX RULE

Defendant by his Signature above pursuant to 28 USC 1746 declares under penalty of perjury that on the date set forth above he placed a copy of this pleading in the jail outgoing mail receptacle, with sufficient 1st class postage attached addressed to the Clerk of Court for filing and service via CM / ECF.